

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of the)	
Wireline Competition Bureau)	WC Docket No. 16-351
Network Change Notification filed by Verizon)	
Maryland,LLC. Under Rule 51 .332)	
in connection)	
with the Retirement of Copper Network Facilities)	
in Maryland)	

OPPOSITION COMMENTS OF
THE MARYLAND OFFICE OF PEOPLE’S COUNSEL
TO THE COPPER RETIREMENT NOTICES SENT BY VERIZON MARYLAND, LLC
TO MARYLAND RETAIL CUSTOMERS UNDER RULE 51.332
AND REQUEST FOR IMMEDIATE SUSPENSION OF THOSE NOTICES
PENDING AN INVESTIGATION

Dated: October 28, 2016

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I. INTRODUCTION

Petitioner, the Maryland Office of People’s Counsel (“Maryland OPC”), by its undersigned attorneys, files these comments in opposition to the untimely and contradictory retail notices that Verizon Maryland, LLC (“Verizon” or “the Company”) is sending to its Maryland customers pursuant to its *Public Notice of Copper Retirement Under Rule 51.332, Copper Retirement ID No. 2016-03-1A-MD* filed with the Federal Communications Commission (FCC) on September 15, 2016 (“Verizon’s Notice to FCC”).¹ Samples of the retail notices are attached hereto as Exhibits 1, 2 and 3. Further, given the time sensitivity of some of the notices, which contain a **December 14, 2016** effective date, OPC further requests that the FCC open an investigation into Verizon Maryland’s copper retirement notices and direct Verizon to suspend any further issuance of such notices until such an investigation is complete.²

The Maryland OPC is an independent government agency with a statutory duty to represent the concerns of Maryland’s ratepayers and public utility consumers.³ Verizon Maryland is the predominant regulated telephone company, the incumbent local exchange carrier (ILEC). Verizon Maryland provides basic local service through copper and in some areas, fiber

¹ The FCC has not yet issued its Public Notice of Verizon’s copper retirement, as required under 47 C.F.R. § 51.332(f).

² Maryland OPC is concurrently filing its opposition with the Maryland Public Service Commission.

³ Maryland Code Ann., Public Utilities Article (PUA) §2-204

lines. The areas affected by Verizon's copper retirement notice are, in general, densely populated communities in central Maryland, located among the I-95 corridor.⁴

Via requests under the Maryland Public Information Act, the Maryland OPC office has reviewed hundreds of complaints from Maryland consumers in the past several years about Verizon's handling of its copper voice maintenance and repair obligations, and its aggressive and often misleading upselling of its fiber-based voice, Internet and TV services. Since Verizon's Notice to the FCC was filed last month, the Maryland OPC has fielded numerous inquiries and complaints from consumers who have received various copper retirement notices from Verizon. OPC has learned that local government agencies such as the Maryland Public Service Commission, the Maryland Office of the Attorney General, Howard County Office of Cable Administration, Montgomery County Office of Consumer Protection, and Montgomery County Office of Cable and Broadband Services have also received consumer inquiries and complaints about Verizon's notices.

Contrary to the FCC's strong emphasis on encouraging carriers like Verizon "to partner with state public service commissions, and other state and local entities to ensure consumers understand and are prepared for the transition,"⁵ Verizon forged no such partnerships in Maryland, to OPC's knowledge. Instead, it sent contradictory and defective notices in violation of FCC rules guiding the nation's transition to a fiber telecommunications network.

⁴ See Exhibit 4, attached, Verizon's Notice to the FCC, which pertains to wire centers in Bethesda (Montgomery County), Columbia (Howard County), Glen Burnie (Anne Arundel County), Rockville (Montgomery County) and Towson (Baltimore County). Verizon has not deployed fiber in significant portions of Maryland, especially rural areas such as the Eastern Shore, Southern or Western Maryland; or in Baltimore City or Prince George's County.

⁵ Copper Transition Order at ¶ 65.

II. SUMMARY

Maryland OPC has four primary objections to Verizon Maryland's notices to retail customers:

1. **Verizon's December 2016 notices to customers are premature.** Verizon is sending letters to the homes of retail customers in Maryland that assert a copper retirement date of December 14, 2016 ("the December 2016 Letters").⁶ These letters violate the timing and implementation provisions in 47 C.F.R. Section § 51.332; contradict the September 2017 copper retirement in Verizon's Notice to the FCC; and contradict letters Verizon is sending to other households⁷ and even to the *very same household* that also assert the September, 2017 date.⁸ Such retail notices should be immediately suspended.
2. **Verizon's retail notices are misleading.** Regardless of implementation date, Verizon's letters violate 47 C.F.R. Section § 51.332(c)(2) by, e.g.: a) incorrectly asserting that fiber voice is the "the same" as copper voice; b) providing misleading and contradictory information on the need for back-up power to provide telephone, alarm, medical and/or emergency service in the event of power outages; c) failing to disclose that customers must buy replacement back-up batteries at their own cost; and d) failing to distinguish Verizon's unregulated FiOS digital voice from Verizon's regulated fiber voice offering.
3. **Verizon's copper retirement may be a Section 214(a) discontinuance.** Neglect of the copper service network could constitute a discontinuance under 47 U.S.C. §214(a),⁹ which

⁶ See Exhibits 1A, B and C, letters to Maryland residents in Baltimore County, Montgomery County, and Anne Arundel County, dated September 29, 2016 or October 13, 2016, proclaiming a December 14, 2016 copper retirement date.

⁷ Exhibit 3, letter to a Maryland resident in Montgomery County, dated September 15, 2016, proclaiming a September 2017 retirement date.

⁸ Exhibits 2A, B and C, letters proclaiming a September 2017 copper retirement date, sent to the same customers who received the letters in Exhibit 1.

⁹ Copper Transition Order at ¶ 93

governs discontinuance, reduction or impairment of a regulated service to the community and requires much more robust Commission deliberation and certification, not mere “notice.” There are petitions before the Maryland Public Service Commission alleging that Verizon Maryland’s failure to maintain its copper network constitutes a *de facto* retirement.¹⁰ At a minimum, Maryland’s regulatory agency should have time to investigate these allegations before Verizon is allowed to retire its copper network.¹¹

4. **Verizon is creating an emergency where there is none.** Verizon’s fiber upgrade website incorrectly states that its copper migration is “required.”¹² Copper migration is not required, it is permitted by the FCC and other regulators, under certain conditions. This misstatement also contributes to an atmosphere of coercion and emergency that may compel customers to purchase products they do not fully need or understand.

Pursuant to 47 C.F.R. § 1.41, Maryland OPC hereby requests the FCC to, at a minimum:

- investigate Verizon’s retail notices;
- order an immediate suspension of Verizon’s December 2016 retail customer notices and implementation date pending investigation by the FCC and/or any investigation undertaken by the Maryland Public Service Commission; and
- order that Verizon amend all of its notices and informational materials distributed in Maryland to be consistent with Section § 51.332(c)(2), as described herein.

¹⁰ See *Communications Workers of America, AFL-CIO – Request for Investigation into Verizon Maryland Service Performance and Service Quality Standards*, Maryland Public Service Commission Case No. 9133 and 9114 (Mail Log No. 174213) September 2, 2015; *Communications Workers of America, AFL-CIO – Request for Investigation into Verizon Maryland Service Performance and Service Quality Standards*, Maryland Public Service Commission Case Nos. 9133 and 9114, (Mail Log No. 177812) November 16, 2015

¹¹ The FCC also has jurisdiction over allegations of a Section 214(a) discontinuance. See Copper Transition Order at ¶93.

¹² http://www.verizon.com/home/MLP/fiberupgrade.html?CMP=DMC-CVZ_ZZ_FD_Z_ZZ_N_X00002 accessed 10/28/2016

III. SOME OF VERIZON’S NOTICES TO CONSUMERS ARE NOT TIMELY; ALL ARE MISLEADING

After a lengthy rule-making process that balanced the interests of companies, consumers, businesses and other stakeholders, the FCC issued several new rules to guide the nation’s transition to a fiber telecommunications network. These rules make clear that the FCC requires the transition to be smooth, with adequate and clear notice to retail consumers.¹³ Verizon’s notices do not fully comport with those rules.¹⁴

A. Verizon’s Planned Copper Retirement Date of December 2016 Is Premature.

Verizon told the FCC, in its formal Notice on September 15, 2016, that it planned to implement its copper retirement as of September, 2017, one year later.¹⁵ Yet some of the letters that Verizon is sending customers in Maryland contradict that filing. While one set of letters, dated September 15, 2016, announce an implementation date of September 2017 (“the 2017 letters”),¹⁶ another set does not. Apparently, Verizon is also subsequently sending additional letters to some Maryland customers – *in the very same households* -- that announce that the customers’ copper voice service will be terminated **on or after December 14, 2016** (“the

¹³ In the Matter of Technology Transitions Policies and Rules Governing Retirement Of Copper Loops by Incumbent Local Exchange Carriers, Special Access for Price Cap Local Exchange Carriers AT&T Corporation, Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, GN Docket No. 13-5; RM-11358; WC Docket No. 05-25; and RM-10593, Tech Order (Rel. August 7, 2015) (“*Copper Transition Order*”) at, e.g. ¶¶ 12, 39 43, 50; In the Matter of Ensuring Continuity of 911 Communications, PS Docket 14-174, FCC-15-98; (Rel. August 7, 2015) (“*911 Continuity Order*”) at, e.g. ¶¶ 49, 56; Declaratory Ruling, Second Report and Order, and Order on Reconsideration, FCC No. 16-90, (Rel. July 15, 2016) at, e.g. ¶¶ 28,58, 69 (“*Voice Replacement Order*”)

¹⁴ The Copper Transition Order at ¶70 states that the FCC Enforcement Bureau will investigate potential carrier violations of the Copper Transition rules.

¹⁵ See Exhibit 4 (Verizon’s Notice to FCC).

¹⁶ See Exhibit 3, letter to a Maryland resident in Montgomery County, titled Notice of Copper Retirement, proclaiming a September 2017 retirement date.

December 2016 letters).¹⁷ Verizon cannot be allowed to issue confusing and contradictory notices. Nor can Verizon be permitted to implement a copper retirement date that violates the requirements of the FCC.

The December 2016 letters violate the timing and implementation provisions of 47 C.F.R. Section § 51.332, which provides for 90 day notice to retail customers before the implementation date of copper retirement. Verizon has miscalculated when it may begin implementing its copper retirement plans. Under the plain terms of the regulation, the triggering event for Verizon to retire copper on a wholesale, community basis (as opposed to an individual basis) is the FCC's formal issuance of its own public notice – NOT the date Verizon mails letters to customers. Section (f) 47 C.F.R. Section § 51.332 provides for automatic approval of a carrier's copper retirement, without FCC intervention, six months after the FCC issues its public notice. That provision states:

Implementation date. The Commission will release a public notice of filings of the notice of copper retirement pursuant to paragraph (b)(1) of this section. The public notice will set forth the docket number and NCD number assigned by the Commission to the incumbent LEC's notice. The notices of copper retirement required by paragraph (b) of this section shall be deemed approved on the 180th day **after the release of the Commission's public notice of the filing.**

In other words, Verizon's retail customer notices of copper retirement (as required by paragraph (b)(3)) are not "deemed approved" until six months AFTER the FCC has issued its formal public notice of filing.¹⁸ Because the Copper Transition Order provides for automatic approval, "notice" is synonymous with "implementation" as long as the requisite time has

¹⁷ See Exhibit 1, letters to Maryland residents, dated September 29, 2016 and October 13, 2016, proclaiming a December 14, 2016 copper retirement date; and Exhibit 2, letters to the same Maryland residents, proclaiming a copper retirement date of December 14, 2016.

¹⁸ The six month time period is meant to protect competing interconnecting carriers and their customers who use the incumbent telephone company's copper loops to provide service. See Copper Transition Order at ¶¶ 9, 28, 29. Retail customers, on the other hand, receive 90-day notice. Copper Transition Order at ¶ 62 (stating that 90 days notice to customers is appropriate).

elapsed. Because the FCC has not yet issued its public notice of filing, the clock has not even started ticking to calculate when Verizon may begin to implement its copper retirement program. As stated in the Copper Transition Order “After the Commission receives notice of the retirement, it will issue a public notice of the retirement, starting the 180-day ‘countdown’ such that the copper retirement may go forward under our rules.”¹⁹ The countdown has not even begun and thus Verizon’s copper retirement may not go forward in December 2016.

The countdown from the FCC’s public notice also applies to notice to customers. Section § 51.332(e)(4), which provides 90 days of notice to retail customers **after** the release of the FCC’s public notice, states that:

An incumbent LEC must provide any notice required by paragraph (b)(3) of this section to all residential customers to whom notice must be provided no later than ninety (90) days **after the Commission's release of the public notice** identified in paragraph (f) of this section.²⁰

Thus, Verizon must send its notice to retail customers no later than three months after the FCC releases its notice, and thus, by logical extension, no later than three months *before* the six-month implementation/approval date in paragraph (f). In other words, the 90 day notice period required in this regulation counts backward from the six-month automatic approval/implementation date. Nothing in Section § 51.332 states that Verizon may start counting the 90 day notice/implementation requirement forward, beginning when it, the Company, mailed its first letters to customers, as its actions in Maryland suggest.²¹ Verizon is

¹⁹ Copper Transition Order at ¶ 29

²⁰ 47 C.F.R. § 51.332(e)(4).

²¹ It should also be noted that there is not, by any count, 90 days between a letter dated September 29, 2016 or October 13, 2016 and an implementation date of December 14, 2016.

not permitted to suspend a community's copper service until six months *after* FCC issues its formal public notice.²²

The December 2016 letters also contain a "Medical Emergency Notice" at the bottom, which informs customers it will grant a 30-day extension IF the customer can provide a doctor's note asserting that "termination of the service will aggravate the medical emergency" AND the customer accepts fiber-optic service from Verizon.²³ This provision does not allow a consumer the choice to switch to another provider and instead appears to coerce the medically vulnerable. The FCC has recognized that the copper transition will most likely provide the most confusion and hardship for medically vulnerable, often elderly citizens, who rely on copper voice services for medical and emergency reliability.²⁴

For each of these reasons, the Commission should order an immediate suspension of all of Verizon's December 2016 notices until these issues are addressed.

B. Verizon's Notices to Retail Customers Are Misleading

Regardless of implementation date, Verizon's notices to Maryland retail customers contain statements that violate the content requirement of the federal rules. The copper retirement regulation in § 51.332 provides that any notice to retail customers "must provide sufficient information to enable the retail customer to make an informed decision as to whether to continue subscribing to the service to be affected by the planned network changes."²⁵ Verizon's notices do not fully comply with this directive.

²² 47 C.F.R. § 51.332(b)(3) provides an exception on copper retirement on an individual basis, to resolve a customer repair, or if the customer consents to the replacement with fiber or other service.

²³ *Id.*

²⁴ Copper Transition Order at ¶3, 9.

²⁵ 47 C.F.R. § 51.332(c)(2)(i).

1. Fiber voice is not the “same” as copper voice.

Verizon’s December 16 notices state that the upgrade will “provide access to the same voice service as you enjoy today.” The face of the notice itself provides no other qualifying information, such as the need for battery back up or the fact that a customer’s DSL line will not work over fiber. While this information is addressed in the Frequently Asked Questions (FAQs) insert, attached to the December 2016 notice, it is not contained in the body of the letter, as it is in the September 2017 Notices, albeit incorrectly.

The FAQs state in paragraph 5 that “Your existing voice service will not change, aside from the added benefit of being delivered over our better quality fiber-optic facilities.”²⁶ While the next sentence informs customers that High Speed Internet may not work over fiber, that same paragraph does not mention the critical fact that fiber wireline telephone service does not work if there is a power outage.²⁷ Instead, that key information is suggested in the next paragraph, number 6, which states that “We will provide you with a backup battery device at no charge that will power your voice in the event of a power outage, allowing you to make and receive calls, including to 911, on your corded telephone.”²⁸

Information contained in different documents or even in different paragraphs does not meet the “clear and conspicuous” requirement of the FCC’s new copper retirement rules, which provides in part that a notice to retail customers must be in a “location that it is readily noticeable,” and “may not contradict or be inconsistent with any other information with which it

²⁶ Nor does that paragraph mention that Verizon’s “distinctive voice” feature may not work over fiber, a fact about which at least one Maryland resident has received conflicting information from Verizon’s sales and technical staff.

²⁷ See 911 Continuity Order at ¶62 (noting that consumers who lose legacy copper service should be informed that voice service will be unavailable during a power outage without backup power, and that this backup power will not also power services other than voice).

²⁸ See, e.g. FAQs attached to letters in Exhibits 1-3.

is presented.”²⁹ The incomplete information also violates the requirement that if “a statement materially modifies, explains or clarifies other information with which it is presented, then the statement must be presented in **proximity** to the information it modifies.”³⁰

The misleading information on copper and fiber being the “same” in the December 2016 Notice and in the FAQs also violates 47 C.F.R. Section 51.332(c)(2)(i)(B), which provides that a notice to retail customers must contain:

A statement that the retail customer will still be able to purchase the existing service(s) to which he or she subscribes with the same functionalities and features as the service he or she currently purchases from the incumbent LEC, **except that if this statement would be inaccurate**, the incumbent LEC must include a statement identifying any changes to the service(s) and the functionality and features thereof.

The FCC made clear that the phrase “any changes to the service(s) and the functionality and features thereof,” includes continuity of power.³¹

2. Connecting devices do not all work in the same way.

The September 2017 Notices assert that “any devices that rely on your voice service, such as fax machines, medical devices or security alarms connected to a central station will continue to work in the same way as they currently do over copper.”³² This statement is misleading because it does not clearly indicate that some of these services a) might be incompatible with fiber; b) will require an independent power source in the event of a power outage; and c) will not even work with battery back up. The statement in Verizon’s letter is contradicted by Verizon’s very own FAQs insert, which states that “cordless phones, alarm equipment, or other devices that require electricity to operate will not be powered by the backup battery device.”

²⁹ 47 C.F.R. § 51.332(c)(2)(iv).

³⁰ 47 C.F.R. § 51.332(c)(2)(iv)(B)(emphasis added).

³¹ Copper Transition Order at ¶43.

³² See Exhibit 3, September 2017 letter, 4th paragraph.

The confusing presentation of this information violates, at a minimum, 47 C.F.R. § 51.332(c)(2)(iv), which provides that a notice to retail customers must be “clear and conspicuous,” and thus in a “location that it is readily noticeable,” and “may not contradict or be inconsistent with any other information with which it is presented.” That section also states that if “a statement materially modifies, explains or clarifies other information with which it is presented, then the statement must be presented in **proximity** to the information it modifies.”³³

3. Battery back up costs are not fully disclosed

Verizon’s Notices (both the December 2016 and the September 2017) state that the upgrade will occur at no cost to the customer. While the Company provides customers with a back up battery at no charge, its FAQs also reveal that “in a prolonged power outage, you can simply replace the D-cell batteries for additional back up power.” In other words, customers facing a prolonged power outage, as recently occurred in the wake of Hurricane Matthew, will have to have D-Cell batteries on hand, at their own cost. Verizon’s statement of “no cost” is misleading.

Furthermore, Verizon’s information on battery back up does not comply with the FCC’s detailed new rules in its 911 Continuity Order on the minimal information providers must disclose to subscribers about battery-back up availability, storage, maintenance and purchase options.³⁴

³³ C.F.R. § 51.332(c)(2)(iv)(B).

³⁴ See FCC 911 Continuity Order at ¶60 (Requiring providers of facilities-based, fixed residential voice services, which are not line powered, to disclose, among other things, the following information: service limitations with and without backup power during a power outage; purchase and replacement options; proper usage and storage conditions for the backup power source; subscriber backup power self testing and monitoring instructions; and backup power warranty details, if any).

4. Verizon's Notices do not distinguish between regulated and unregulated voice

Verizon's letters, FAQs and its Fiber Upgrade website do not make a clear distinction between Verizon's three wireline voice offerings: copper voice, fiber voice and FiOS digital voice. Verizon's regular (non-Fiber Upgrade) website only adds to the confusion by informing consumers that "Verizon offers **two methods** of delivering telephone service: through traditional copper wire and through FiOS® fiber optic technology."³⁵

The distinction is important because the first two are regulated; digital voice is not. The FCC noted that the record in the copper transition docket was "replete" with evidence that Verizon's digital voice service, VoiceLink was inferior to legacy phone service.³⁶ Indeed, the potential replacement of copper services with VoiceLink became a source of controversy and consumer angst after Hurricane Sandy hit the States of New York and New Jersey in October 2012, when Verizon announced its intention not to fix the utility customers' copper-based services in certain areas after the storm, instead replacing those services with Voice Link.

In addition, the FCC noted concerns that Verizon has migrated unsuspecting customers from regulated to unregulated services without adequate customer notice and consent.³⁷ In fact, the FCC cited evidence in the record regarding the Verizon's pressure on customers in Montgomery

³⁵ Available at

<https://www.verizon.com/support/residential/phone/homephone/general+support/fios+phone/questions+and+answers/95508.htm> (Accessed October 18, 2016)(emphasis added).

³⁶ Copper Transition Order ¶14 (discussing Verizon's attempt to replace copper voice service with its VoiceLink wireless on Fire Island); Copper Transition Order at ¶220 (citing New York Public Service Commission Comments at 8 ("The NYPSC sought comments from interested parties and stakeholders on Voice Link technology, service plans, and delivery. The vast majority of the commenters objected to Voice Link as a network replacement. Commenters were critical of Voice Link's inferior sound quality and limited functionality (i.e., lacking support for Fax, Internet access, and other traditional copper-based telephone functions, such as operator service and long-distance provider choice).").

³⁷ Copper Transition Order at ¶39.

County, Maryland to switch services not just to fiber but to a package of digital services offered over the fiber network.³⁸

The failure of Verizon's notice and consumer information about the clear and important differences between copper voice, fiber voice, digital voice (and even wireless voice) perhaps portend more change to come in the future. In the present, the omission violates both the spirit and letter of the FCC Copper Transition Order, which demands that customers be informed of what alternatives to copper phone service exist for customers in transition.³⁹

C. Verizon's Copper Retirement May Be a Section 214(a) Discontinuance.

Verizon's copper notice activities in Maryland could also trigger Section 214(a) of the U.S. Code. This statute governs discontinuance, reduction or impairment of a regulated service to the community and requires much more robust Commission deliberation and certification, not mere notice and automatic approval.⁴⁰ The FCC distinguishes between its copper notice regulations and the discontinuance statute this way: "copper retirement network change notification process and the discontinuance approval process remain fundamentally distinct because the former **concerns changes in facilities** and merely requires notice, while the latter concerns **changes in services** and requires Commission approval."⁴¹ The FCC notes that a carrier's actions in retiring copper might invoke a Section 214(a) discontinuance proceeding if, for example, it offers an inferior voice service such as Verizon's VoiceLink wireless service,⁴² or neglects its copper

³⁸ Copper Transition Order ¶53 (citing a local NBC news story by Liz Crenshaw and Patti Petite, "Killing Copper? Customers Say They Felt Pressured Into FiOS" (Dec. 9, 2013) <http://www.nbcwashington.com/news/local/Verizon-Fios-Phone-Copper-Customers-Say-They-Felt-Pressured-Into-Fios-235098041.html>).

³⁹ Id at ¶43.

⁴⁰ 47 U.S.C. §214(a).

⁴¹ Copper Transition Order at ¶ 92 (emphasis added).

⁴² Copper Transition Order ¶¶14,66,182 (discussing Verizon's provision of wireless VoiceLink in Fire Island, New York).

network such that it amounts to a *de facto* retirement.⁴³ The FCC stated that allowing copper deterioration is the “functional equivalent of removal or disabling it without first following the notice-based copper retirement process. In addition, we caution that this clarification is not a loophole and if we see evidence of abuse, we will reevaluate the issue and take action if appropriate.”⁴⁴

In Maryland, the Communications Workers of America has recently alleged that Verizon is intentionally neglecting its copper network in various communities in Maryland, and has asked the Maryland Public Service Commission to investigate.⁴⁵ While the Maryland PSC has not yet ruled on these requests, ordering a suspension of at least Verizon’s December Notices will allow the Maryland PSC to look into such allegations should it see fit to do so.⁴⁶

D. Verizon’s Fiber Migration Is Not “REQUIRED”

Verizon’s notices direct consumers to its website, www.verizon/fiberupgrade, for more information. The website states, among other things, that the copper to fiber migration is “required.”⁴⁷ This statement is incorrect. The FCC is *permitting* the Company to pursue its preferred business strategy, as long as it complies with federal and state law. At a bare minimum, as explained above, the 180-day time period for the FCC’s automatic approval has not even begun.⁴⁸ Also, as discussed above, there is some evidence in Maryland that Verizon is engaging

⁴³ Copper Transition Order at ¶ 93.

⁴⁴ *Id.*

⁴⁵ *See* FN 10.

⁴⁶ *See* Copper Transition Order at ¶63 (state commissions may retain an enforcement role in Section 214(a) discontinuances).

⁴⁷ www.verizon/fiberupgrade, page 2, accessed October 28, 2016.

⁴⁸ 47 C.F.R. Section § 51.332(f) a notice of copper retirement “shall be deemed approved on the 180th day **after** the release of the Commission’s public notice of filing.” The Commission has not, of this writing, released its public notice of filing.

in *de facto* retirement of its copper Transitions, which would invite more scrutiny from both the Maryland Public Service Commission and the FCC.

Contrary to the FCC’s strong emphasis on encouraging carriers like Verizon “to partner with state public service commissions, and other state and local entities to ensure consumers understand and are prepared for the transition,”⁴⁹ Verizon partnered with no one in Maryland, to the knowledge of Maryland OPC. Instead, it simply sent out its defective and contradictory notices, perhaps hoping no regulatory agency would notice, or protest.⁵⁰ It could – and should – have chosen an easier path, and worked with state agencies on the timing and content of its notices. It chose not to. This business choice has left state agencies scrambling to explain to angry and confused consumers all the information that Verizon’s notices do not.

IV. CONCLUSION

Pursuant to 47 C.F.R. § 1.41, Maryland OPC hereby requests the FCC to, at a minimum:

- investigate Verizon’s retail notices;
- order an immediate suspension of Verizon’s December 2016 retail customer notices and implementation date pending investigation by the FCC and/or any investigation undertaken by the Maryland Public Service Commission; and
- order that Verizon amend all of its notices and informational materials distributed in Maryland to be consistent with Section § 51.332(c)(2), as described herein.

⁴⁹ Copper Transition Order at ¶ 65.

⁵⁰ Verizon sent letters to customers before the FCC even opened a docket or published its own notice in this matter.

Respectfully submitted,

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/electronic signature/
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Dated: October 28, 2016

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 28th day of October, 2016, the foregoing “Opposition Comments of the Maryland Office of People’s Counsel to the Copper Retirement Notices Sent by Verizon Maryland, LLC to Maryland Retail Customers Under Rule 51.332 and Request for Immediate Suspension of Those Notices Pending an Investigation” was served, pursuant to 47 C.F.R. § 1.47, by email and/or U.S. postal service, postage prepaid, to the following:

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Respectfully submitted,

/electronic signature/

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ACTION REQUIRED - NOTICE OF VERIZON NETWORK UPGRADE

September 29, 2016

LTR1_RES*****AUTO**3-DIGIT 210 T32 P2 PAL 2 00009590

L C Minder
14 Scottsdale Ct
Luthvle Timon, MD 21093-4714



Dear L C Minder:

Telephone Number: 410-821-7089

We're excited to let you know that we're upgrading our facilities in your area and that your Verizon services will need to be moved to our newer, more reliable network. This move will be done at no cost to you and will provide access to the same voice service you enjoy today at the same price and terms. Our goal is to make this transition as easy as possible for you.

It's important that you contact us by December 14, 2016 to schedule an appointment to have one of our expert technicians come to your residence and move your services. Our technician will ensure that all of your services are moved correctly and will address any questions you have while onsite. Once our facilities are upgraded to fiber, we will no longer provide service over our older network in your area. This means that if you have not scheduled an appointment to transfer your services, your Verizon services will be suspended on or after December 14, 2016.

Getting started is simple -- just give us a call at **1.877.439.7442** as soon as possible, and we'll schedule an appointment for you. We are available Monday-Friday (8:00 am-8:00 pm) and Saturday (9:00-5:00 pm).

Please review the attached Frequently Asked Questions for additional information about this upgrade. If you still have questions, please call us at **1.877.439.7442** or visit our website, **www.verizon.com/fiberupgrade**.

If you have already placed an order to migrate or disconnect your service, thank you and please disregard this notice.

Thank you for continuing to be a loyal customer. We greatly appreciate your business.

Sincerely,

Janet Gazlay Martin
Director-Network Transformation
Verizon
230 W 36th St. Rm 802
NY, NY 10018

MEDICAL EMERGENCY NOTICE: If someone living in your home has an emergency illness, we will not turn off your telephone service for up to 30 days if you do two things: (1) have a medical doctor inform us in writing of the existence of the emergency, its nature and probable duration and that termination of the service will aggravate the medical emergency; and (2) make acceptable arrangements for Verizon to transition your service to a fiber-optic line. Please see the attached Frequently Asked Questions for more information.

LTR1_RES



**SE REQUIERE ACCIÓN INMEDIATA: AVISO DE ACTUALIZACIÓN
DE LA RED DE VERIZON**

29 de septiembre 2016

LTR1_RES*****AUTO**3-DIGIT 210 T32 P2 PAL 2 00009590

L C Minder

14 Scottsdale Ct

Luthvle Timon, MD 21093-4714



Estimado(a) L C Minder:

Número de teléfono: 410-821-7089

Nos complace anunciar que estamos actualizando nuestras instalaciones en su zona y que sus servicios de Verizon se trasladarán a una red más moderna y confiable. Este cambio no le costará nada y dispondrá de acceso al mismo servicio de voz del que disfruta ahora al mismo precio y con las mismas condiciones. Nuestra intención es que esta transición sea lo más fácil posible para usted.

Es importante que se comuniquen con nosotros con fecha límite de 14 de diciembre 2016 con el fin de hacer una cita para que uno de nuestros técnicos expertos acuda a su residencia a trasladar sus servicios. El técnico se asegurará de que todos los servicios sean trasladados correctamente y responderá a las preguntas que usted pueda tener. Cuando acabemos de actualizar las instalaciones a fibra, dejaremos de ofrecer los servicios a través de la red antigua de su zona. Esto significa que si no hizo una cita para transferir los servicios de Verizon, estos serán suspendidos el día 14 de diciembre 2016 o después de esa fecha.

Para poner el proceso en marcha solo tiene que llamarnos al **1.877.439.7442** tan pronto como sea posible para hacer la cita. Puede llamar de lunes a viernes de 8:00 a.m. a 8:00 p.m. y los sábados de 9:00 a.m. a 5:00 p.m.

En la sección de preguntas más frecuentes encontrará más información sobre la actualización. Si sigue teniendo alguna duda, llame al **1.877.439.7442** o visite nuestra página web en **www.verizon.com/fiberupgrade**.

Si ya solicitó la migración o desconexión del servicio, le damos las gracias y puede ignorar este aviso.

Permítame agradecerle su lealtad como cliente y su confianza.

Atentamente,

Janet Gazlay Martin
Directora-Network Transformation
Verizon
230 W 36th St. Rm 802
NY, NY 10018

AVISO DE URGENCIA MÉDICA: Si alguien en su residencia sufre una enfermedad de urgencias, no desconectaremos el servicio telefónico por un plazo máximo de 30 días si hace lo siguiente: (1) pedirle a un médico que nos informe por escrito de la existencia de la urgencia, su naturaleza y que la suspensión del servicio agravará la urgencia médica; y (2) toma las medidas razonables necesarias para trasladar su servicio a la línea de fibra óptica. En la sección de preguntas más frecuentes encontrará más información.

Frequently Asked Questions

- 1. What is the new network?** Verizon will be installing our advanced all-fiber optic facilities in your home.
- 2. Why fiber optics?** Verizon's new fiber optic network will enable us to provide you with higher quality services over a more reliable and resilient technology.
- 3. I don't want Fios. What are my alternatives?** This is not Fios voice service. It is your existing voice service, only provided over fiber instead of copper, at the same price, terms, and conditions. Any devices that rely on your current voice service, such as facsimile, security alarms connected to a central station, or medical monitoring equipment, will continue to work in the same way as they did over copper. For High Speed Internet customers, the product you currently have is not available on fiber, but Verizon can provide you with a Fios Internet product that is significantly faster at a special rate. In some cases, this price may be lower or higher than what you currently pay.
- 4. What happens if I do not schedule an appointment?** Your Verizon service will be suspended on or after December 14, 2016 if you do not allow Verizon reasonable access to your premises to install, maintain, or replace equipment and facilities that will enable us to move your service to our fiber-optic facilities. Once your service is suspended, you will only be able to call 9-1-1 and our customer service number, which is 1.800.VERIZON (1.800.837.4966). Approximately 14 days after being suspended, Verizon service at your address will be disconnected unless you allow us to move your service to our fiber-optic facilities.
- 5. What equipment is needed in order for me to upgrade to fiber?** We will extend our fiber optic facilities to your home, and our technician will install an Optical Network Terminal (ONT) for voice service at your home. The placement of this equipment will vary depending on the type of home you live in. We should be able to use the existing wiring in your home, and you will be able to use your existing telephones.
- 6. What is the installation process?** We will work with you to schedule a convenient installation date. On the day of installation, our technician will install the equipment and ensure that your voice service is working properly with your equipment. If you choose to subscribe to new services available on fiber optics, such as Fios Internet or Fios TV, the technician will provide professional installation of those services as well. The technician will address any questions at the time of installation.
- 7. What do I need to do?** You will need to schedule an installation appointment at a time when someone 18 years or older will be home. You will also need to provide access to a grounded electrical outlet, which is required to power the ONT.
- 8. Will I be charged for the fiber installation or the new equipment?** There is no charge for the fiber optic extension to your home, nor is there a charge for any necessary equipment to migrate your Verizon telephone service. If you are migrating from High Speed Internet, or if you purchase services such as Fios TV, you may be charged for the equipment for these services depending on which you select.
- 9. Will my service change as a result of this network upgrade?** If you upgrade your existing voice service, your services will not change, though you will benefit from the higher quality fiber optic network. You will also not see any changes to your bill for your existing voice service. High Speed Internet customers who upgrade will be offered our Fios product.
- 10. Will my rates change after I upgrade to fiber?** If you move your existing voice services and do not choose to subscribe to any Fios services, you will not see any changes to your bill for your existing voice service. For High Speed Internet customers, the service you currently have is not available on fiber optics, but we can provide you with a Fios internet product that is significantly faster for a special rate. In some cases, this price may be lower or higher than what you currently pay.
- 11. What is the battery backup?** The battery power unit is designed to provide you with backup power for your voice service in the event of a power outage. In such an event, without the backup power unit, telephones in your home will not function, you will not have voice service, and, if you have an alarm system, it may not be able to dial out to a central monitoring station. The backup power unit will allow you to make telephone calls on a corded telephone handset, but it will not power cordless telephones, alarm system equipment, or other devices or equipment that require power. To power those devices during a commercial power outage, you will need an alternative power source such as a generator or uninterrupted power supply.
- 12. What about 911?** There will be no changes to the 911 emergency service as a result of upgrading to the new fiber optic network. In the event of an extended power outage that fully depletes battery power in the backup power unit, please put in new batteries in order to place telephone calls, including 911 calls, from a corded telephone handset. Or you will need to use an alternative, such as a cell phone, to dial 911.
- 13. What other Verizon services are available on fiber optics?** In most cases, Verizon Fios Internet and Fios TV are also available on our fiber optic facilities.
- 14. What if there is a medical emergency in my home?** If you or anyone presently and normally living in your home is seriously ill, we will not cut off your telephone service for up to 30 days during such illness provided you: (a) have a physician certify by phone or in writing that such an illness exists and that the person will be endangered if your telephone service is stopped; and (b) contact us at 1.877.439.7442 to place an order by December 14, 2016 to transfer your voice service to fiber.

Preguntas más frecuentes

- 1. ¿En qué consiste la nueva red?** Verizon instalará la red de fibra óptica avanzada en su vivienda.
- 2. ¿Por qué la fibra óptica?** Gracias a la nueva red de fibra óptica de Verizon, podremos prestarle servicios de mayor calidad mediante una tecnología más fiable y resistente.
- 3. No quiero Fios. ¿Qué otras alternativas hay?** Este no es un servicio Fios, si no el servicio de voz que ya tiene, excepto que se presta por fibra en lugar de a través de instalaciones de cobre, al mismo precio y con los mismos términos y condiciones. Los dispositivos que dependan del servicio de voz, como pueden ser máquinas de fax, dispositivos de monitoreo médico o alarmas de seguridad conectadas a una estación central, seguirán funcionando como lo han hecho hasta ahora con las instalaciones de cobre. En el caso de los clientes de Internet de Alta Velocidad, dicho producto no se ofrece con la fibra óptica, pero Verizon le ofrece varios productos de Internet de Fios mucho más rápidos a un precio especial. En algunos casos, el precio puede ser inferior o superior al que paga ahora.
- 4. ¿Qué ocurrirá si no hago una cita?** El servicio de Verizon será suspendido el día 14 de diciembre 2016 o después de esa fecha si no permite a Verizon acceso razonable a su vivienda para instalar, mantener o reemplazar el equipo y las instalaciones que nos permitirán trasladar el servicio al de fibra óptica. Si se suspende el servicio, solo podrá llamar al 9-1-1 y a nuestro teléfono de atención al cliente, que es el 1.800.VERIZON (1.800.837.4966). Unos 14 días después de la suspensión, se cancelará el servicio de Verizon en su domicilio, a no ser que nos permita trasladar el servicio a las instalaciones de fibra óptica.
- 5. ¿Qué equipo necesito para actualizar el servicio a la fibra óptica?** Extenderemos las instalaciones de fibra hasta su residencia y el técnico instalará un terminal de red óptica (ONT) para el servicio de voz. El lugar en el que se instalará el equipo dependerá del tipo de vivienda que tenga. Generalmente pueden utilizarse los cables que ya hay en la casa y usted podrá seguir usando los teléfonos que tiene.
- 6. ¿En qué consiste el proceso de instalación?** Hablaremos con usted para hacer una cita en la fecha que le resulte más conveniente. El día de la instalación, el técnico instalará el equipo y se asegurará de que el servicio de voz funcione correctamente con el equipo que usted tiene. Si decide suscribirse a los nuevos servicios disponibles en el sistema de fibra óptica, como por ejemplo Fios Internet o Fios TV, el técnico también se los instalará. Además responderá a las preguntas que tenga en el momento de la instalación.
- 7. ¿Qué necesito hacer?** Tendrá que hacer una cita para la instalación a una hora en la que haya en casa alguien que tenga más de 18 años. También necesitará tener un tomacorrientes disponible, ya que se necesita para enchufar la ONT.
- 8. ¿Tendré que pagar algo por la instalación de fibra o por el equipo nuevo?** No tendrá que pagar nada por la extensión de la fibra óptica hasta su residencia ni por el equipo necesario para migrar el servicio telefónico de Verizon. Si ahora tiene Internet de Alta Velocidad y va a migrar el servicio o si se ha suscrito a servicios tales como Fios TV, es posible que se le cobre por el equipo relacionado, dependiendo del servicio que elija.
- 9. ¿Cambiará el servicio debido a la actualización de la red?** Si actualiza el servicio de voz que tiene ahora, no habrá ningún cambio, aunque se beneficiará de la calidad superior de la red de fibra óptica. Tampoco habrá cambios en la factura del servicio de voz. A los clientes de Internet de Alta Velocidad que actualicen se les ofrecerá nuestro producto Fios.
- 10. ¿Me cambiarán los precios después de la actualización con fibra?** Si traslada los servicios de voz y decide no suscribirse a ningún servicio de Fios, no habrá ningún cambio en la factura del servicio de voz. En el caso de los clientes de Internet de Alta Velocidad, ese servicio no se ofrece con la fibra óptica, pero le ofrecemos un producto de Internet de Fios mucho más rápido a un precio especial. En algunos casos, el precio puede ser inferior o superior al que paga ahora.
- 11. ¿Qué es la batería de reserva?** La unidad de suministro de batería le ofrece energía eléctrica para el servicio de voz cuando se produce un corte de electricidad. En esos casos, sin esta unidad de reserva, los teléfonos no funcionan, no tendrá servicio de voz y, si tiene un sistema de alarma, no podrá llamar a la central de control. La unidad de reserva permite llamar desde un teléfono de cable, aunque no funciona para teléfonos inalámbricos, sistemas de alarma ni ningún otro dispositivo o equipo que requiera electricidad. Si desea que esos dispositivos funcionen durante un corte de electricidad, necesitará otra fuente de energía, como puede ser un generador o una unidad de suministro de energía ininterrumpido.
- 12. ¿Qué ocurrirá con el 911?** No habrá ningún cambio en el servicio de emergencias 911 con motivo de la actualización a la nueva red de fibra óptica. Si el corte eléctrico se prolonga y se gastan las pilas de la unidad de reserva, ponga pilas nuevas para poder llamar por teléfono, incluido al 911, desde un teléfono de cable. Si no lo hace, tendrá que usar otro medio, por ejemplo un teléfono celular para llamar al 911.
- 13. ¿Qué otros servicios de Verizon se ofrecen en las instalaciones de fibra óptica?** En la mayoría de los casos, las instalaciones de fibra óptica ofrecen los servicios Fios Internet y Fios TV de Verizon.
- 14. ¿Qué ocurre si hay una urgencia médica en mi casa?** Si usted o alguien que vive con usted se pone gravemente enfermo, no le cortaremos el servicio telefónico durante 30 días como máximo mientras dure la enfermedad siempre que se cumplan las siguientes condiciones: (a) pídale a un médico que certifique por teléfono o por escrito la existencia de la enfermedad y que la persona estará en peligro si le suspenden el servicio telefónico; y (b) llámenos al 1.877.439.7442 para suscribirse a un servicio con fecha límite de 14 de diciembre 2016 con el fin de transferir el servicio de voz a la fibra.



ACTION REQUIRED - NOTICE OF VERIZON NETWORK UPGRADE

September 29, 2016

LTR1_RES*****AUTO**3-DIGIT 208 T33 P1 PAL 2 00009728

M Plevin
1095 Copperstone Ct
Rockville, MD 20852-1141



Dear M Plevin:

Telephone Number: 301-251-1090

We're excited to let you know that we're upgrading our facilities in your area and that your Verizon services will need to be moved to our newer, more reliable network. This move will be done at no cost to you and will provide access to the same voice service you enjoy today at the same price and terms. Our goal is to make this transition as easy as possible for you.

It's important that you contact us by December 14, 2016 to schedule an appointment to have one of our expert technicians come to your residence and move your services. Our technician will ensure that all of your services are moved correctly and will address any questions you have while onsite. Once our facilities are upgraded to fiber, we will no longer provide service over our older network in your area. This means that if you have not scheduled an appointment to transfer your services, your Verizon services will be suspended on or after December 14, 2016.

Getting started is simple -- just give us a call at **1.877.439.7442** as soon as possible, and we'll schedule an appointment for you. We are available Monday-Friday (8:00 am-8:00 pm) and Saturday (9:00-5:00 pm).

Please review the attached Frequently Asked Questions for additional information about this upgrade. If you still have questions, please call us at **1.877.439.7442** or visit our website, **www.verizon.com/fiberupgrade**.

If you have already placed an order to migrate or disconnect your service, thank you and please disregard this notice.

Thank you for continuing to be a loyal customer. We greatly appreciate your business.

Sincerely,

Janet Gazlay Martin
Director-Network Transformation
Verizon
230 W 36th St. Rm 802
NY, NY 10018

MEDICAL EMERGENCY NOTICE: If someone living in your home has an emergency illness, we will not turn off your telephone service for up to 30 days if you do two things: (1) have a medical doctor inform us in writing of the existence of the emergency, its nature and probable duration and that termination of the service will aggravate the medical emergency; and (2) make acceptable arrangements for Verizon to transition your service to a fiber-optic line. Please see the attached Frequently Asked Questions for more information.

LTR1_RES



ACTION REQUIRED - NOTICE OF VERIZON NETWORK UPGRADE

October 13, 2016

LTR1_RES*2850/2-16*****AUTO**5-DIGIT 21060

Louise Hoffman

7707 Overhill Rd

Glen Burnie, MD 21060-8193



Dear Louise Hoffman:

Telephone Number: 410-760-8545-433

We're excited to let you know that we're upgrading our facilities in your area and that your Verizon services will need to be moved to our newer, more reliable network. This move will be done at no cost to you and will provide access to the same voice service you enjoy today at the same price and terms. Our goal is to make this transition as easy as possible for you.

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Sincerely,

Janet Gazlay Martin

Director-Network Transformation

Verizon

230 W 36th St. Rm 802

NY, NY 10018

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LTR1_RES

Frequently Asked Questions

- 1. What is the new network?** Verizon will be installing our advanced all-fiber optic facilities in your home.
- 2. Why fiber optics?** Verizon's new fiber optic network will enable us to provide you with higher quality services over a more reliable and resilient technology.
- 3. I don't want Fios. What are my alternatives?** This is not Fios voice service. It is your existing voice service, only provided over fiber instead of copper, at the same price, terms, and conditions. Any devices that rely on your current voice service, such as facsimile, security alarms connected to a central station, or medical monitoring equipment, will continue to work in the same way as they did over copper. For High Speed Internet customers, the product you currently have is not available on fiber, but Verizon can provide you with a Fios Internet product that is significantly faster at a special rate. In some cases, this price may be lower or higher than what you currently pay.
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- 5. What equipment is needed in order for me to upgrade to fiber?** We will extend our fiber optic facilities to your home, and our technician will install an Optical Network Terminal (ONT) for voice service at your home. The placement of this equipment will vary depending on the type of home you live in. We should be able to use the existing wiring in your home, and you will be able to use your existing telephones.
- 6. What is the installation process?** We will work with you to schedule a convenient installation date. On the day of installation, our technician will install the equipment and ensure that your voice service is working properly with your equipment. If you choose to subscribe to new services available on fiber optics, such as Fios Internet or Fios TV, the technician will provide professional installation of those services as well. The technician will address any questions at the time of installation.
- 7. What do I need to do?** You will need to schedule an installation appointment at a time when someone 18 years or older will be home. You will also need to provide access to a grounded electrical outlet, which is required to power the ONT.
- 8. Will I be charged for the fiber installation or the new equipment?** There is no charge for the fiber optic extension to your home, nor is there a charge for any necessary equipment to migrate your Verizon telephone service. If you are migrating from High Speed Internet, or if you purchase services such as Fios TV, you may be charged for the equipment for these services depending on which you select.
- 9. Will my service change as a result of this network upgrade?** If you upgrade your existing voice service, your services will not change, though you will benefit from the higher quality fiber optic network. You will also not see any changes to your bill for your existing voice service. High Speed Internet customers who upgrade will be offered our Fios product.
- 10. Will my rates change after I upgrade to fiber?** If you move your existing voice services and do not choose to subscribe to any Fios services, you will not see any changes to your bill for your existing voice service. For High Speed Internet customers, the service you currently have is not available on fiber optics, but we can provide you with a Fios internet product that is significantly faster for a special rate. In some cases, this price may be lower or higher than what you currently pay.
- 11. What is the battery backup?** The battery power unit is designed to provide you with backup power for your voice service in the event of a power outage. In such an event, without the backup power unit, telephones in your home will not function, you will not have voice service, and, if you have an alarm system, it may not be able to dial out to a central monitoring station. The backup power unit will allow you to make telephone calls on a corded telephone handset, but it will not power cordless telephones, alarm system equipment, or other devices or equipment that require power. To power those devices during a commercial power outage, you will need an alternative power source such as a generator or uninterrupted power supply.
- 12. What about 911?** There will be no changes to the 911 emergency service as a result of upgrading to the new fiber optic network. In the event of an extended power outage that fully depletes battery power in the backup power unit, please put in new batteries in order to place telephone calls, including 911 calls, from a corded telephone handset. Or you will need to use an alternative, such as a cell phone, to dial 911.
- 13. What other Verizon services are available on fiber optics?** In most cases, Verizon Fios Internet and Fios TV are also available on our fiber optic facilities.
- 14. What if there is a medical emergency in my home?** If you or anyone presently and normally living in your home is seriously ill, we will not cut off your telephone service for up to 30 days during such illness provided you: (a) have a physician certify by phone or in writing that such an illness exists and that the person will be endangered if your telephone service is stopped; and (b) contact us at 1.877.439.7442 to place an order by December 14, 2016 to transfer your voice service to fiber.



NOTICE OF COPPER RETIREMENT

September 15, 2016

LTR0_RES*****AUTO**5-DIGIT 21093 T281 P1 PAL 7 00057552

L C Minder
14 Scottsdale Ct
Luthvle Timon, MD 21093-4714



Dear L C Minder:

Telephone Number: 410-821-7089

Currently, Verizon brings voice and/or data services to your home over copper cables. However, the company is upgrading to fiber-optic technology in your area, and will be retiring its copper facilities that currently serve you and your neighbors.

Our plan is to retire copper facilities in your area on or after September 15, 2017. To continue to provide you service, Verizon will have to move your service to these fiber-optic facilities.

Over the next few months, Verizon will be contacting you to schedule an appointment to have a Verizon technician come to your home and set up your services on fiber. You may also call us at 1.877.439.7442 to schedule an appointment.

We will transfer your voice services from copper to fiber at no cost to you. This transfer will not result in any change to the voice service that you currently receive from Verizon. You may continue to subscribe to the same voice service at the same price, terms, and conditions. In addition, any devices that rely on your voice service, such as fax machines, medical devices, or security alarms connected to a central station, will continue to work in the same way as they currently do over copper. We will also provide you with a battery backup device at no charge. For almost all residential customers, that device uses standard D-cell batteries that can support up to 20 hours of standby voice service during a commercial power outage. In case of a prolonged power outage, you can simply replace the batteries and extend the backup power.

If you subscribe to our High Speed Internet service, the migration to fiber will require a change since that service is not available on our fiber facilities. The Internet access service that we offer on fiber is Fios Internet. Fios Internet is available at significantly faster speeds than High Speed Internet. We will offer the service at a special rate for customers who migrate from copper to fiber facilities as a result of the retirement of our copper facilities. In some cases, this price may be lower or higher than what you currently pay for Internet access.

Please review the Frequently Asked Questions for additional information about the fiber upgrade or visit us at verizon.com/fiberupgrade. If you still have questions, please call us Monday through Friday, 8 a.m. - 8 p.m., or Saturday 9 a.m. - 5 p.m. at 1.877.439.7442.

You may also contact the Federal Communications Commission or your State Commission if you have any questions.

Thank you for continuing to be a loyal customer. We greatly appreciate your business.

Sincerely,

Janet Gazlay Martin
Director-Network Transformation
Verizon
230 W 36th St. Rm 802
NY, NY 10018

LTR0_RES



AVISO DE RETIRADA DEL COBRE

15 de septiembre 2016

LTR0_RES*****AUTO**5-DIGIT 21093 T281 P1 PAL 7 00057552
L C Minder
14 Scottsdale Ct
Luthvle Timon, MD 21093-4714



Estimado(a) L C Minder:

Número de teléfono: 410-821-7089

En la actualidad, Verizon le presta los servicios de voz o datos que llegan a su hogar a través de cables de cobre. No obstante, la compañía está instalando tecnología de fibra óptica en su zona y esto significa que se retirarán las instalaciones de cobre que les sirven a usted y a sus vecinos.

Nuestro plan es que las instalaciones de cobre ya estén retiradas con fecha de 15 de septiembre 2017 o después. Para poder continuar prestandole sus servicios, Verizon tendrá que trasladarlos a las nuevas instalaciones de fibra óptica.

Durante los próximos meses, Verizon se comunicará con usted con el fin de hacer una cita para que un técnico de Verizon le visite y le instale los servicios de fibra. Si lo prefiere, puede llamarnos al teléfono 1.877.439.7442 para hacer la cita.

La transferencia de los servicios de voz de cobre a fibra será gratuita. Esta transferencia no cambiará de ningún modo el servicio de voz que usted recibe de Verizon. Podrá seguir suscrito el mismo servicio de voz al mismo precio y con los mismos términos y condiciones. Además, los dispositivos que dependan del servicio de voz, como pueden ser máquinas de fax, dispositivos médicos o alarmas de seguridad conectadas a una estación central, seguirán funcionando como lo han hecho hasta ahora con las instalaciones de cobre. También le facilitaremos gratis un dispositivo que funcionará como batería de reserva. Para la mayoría de los clientes residenciales, estos dispositivos emplean pilas D-cell, capaces de proporcionar 20 horas de energía al servicio de voz en espera cuando se produce un corte de electricidad. Si el corte dura más de ese tiempo, solo tiene que cambiar las pilas para prolongar la disponibilidad.

Si se suscribe a nuestro servicio de Internet de Alta Velocidad, sí habrá un cambio, ya que dicho servicio no se ofrece en las instalaciones de fibra. En su lugar el acceso a Internet se ofrece a través del servicio Internet de Fios. Internet de Fios está disponible a velocidades muy superiores a las que alcanza el Internet de Alta Velocidad. Este servicio estará disponible a un precio especial para los clientes que migren de cobre a fibra como resultado de la retirada de las instalaciones de cobre. En algunos casos, el precio puede ser inferior o superior al que paga ahora por el acceso a Internet.

En la sección de preguntas más frecuentes encontrará más información sobre la actualización con fibra o también puede visitar verizon.com/fiberupgrade. Si sigue teniendo alguna duda, llámenos de lunes a viernes de 8 a.m. a 8 p.m. o los sábados de 9 a.m. a 5 p.m. al 1.877.439.7442.

También puede ponerse en contacto con la Comisión Federal de Comunicaciones o la comisión de su estado si tiene alguna pregunta.

Permítame agradecerle su lealtad como cliente y su confianza.

Atentamente,

Janet Gazlay Martin
Directora-Network Transformation
Verizon
230 W 36th St. Rm 802
NY, NY 10018

On behalf of:

Verizon Delaware LLC 901 Tatnall Street Wilmington, DE 19801	Verizon New Jersey Inc. 540 Broad Street Newark, NJ 07102	Verizon Virginia LLC 22001 Loudoun County Parkway Ashburn, VA 20147
Verizon Maryland LLC 1 East Pratt Street Baltimore, MD 21202	Verizon New York Inc. 140 West Street New York, NY 10007	
Verizon New England Inc. 125 High Street Oliver Tower 7th Floor Boston, MA 02110	Verizon Pennsylvania LLC 1717 Arch Street Philadelphia, PA 19103	

Federal Communications Commission

445 12th Street SW
Washington, DC 20554
Phone: (888) 225-5322

<https://consumercomplaints.fcc.gov/hc/en-us>

State Public Utility Commissions

Delaware Public Service Commission Cannon Building, Suite 100 861 Silver Lake Boulevard Dover, DE 19904 (302)736-7500	New York State Department of Public Service 3 Empire State Plaza Albany, New York 12223-1350 (518) 474-6530
Maryland Public Service Commission William Donald Schaefer Tower 6 St. Paul St., 16th Floor Baltimore, MD 21202 (410) 767-8000	Pennsylvania Public Utility Commission PO Box 3265 Harrisburg, PA 17105-3265 (717) 772-7777
Massachusetts Department of Telecom & Cable 1000 Washington Street Suite 820 Boston, MA 02118-6500 (617) 305-3580	Rhode Island Public Utilities Commission 89 Jefferson Boulevard Warwick, RI 02888 (401) 941-4500
New Jersey Board of Public Utilities 44 S. Clinton Avenue Trenton, NJ 08625 (800) 624-0241	Virginia State Corporation Commission Public Utilities P.O. Box 1197 Richmond, Virginia 23218 (804) 371-9420

If you have questions about this notice, please reference the applicable Copper Retirement ID Number(s) for your state(s) in your inquiry:

Service Address State	Copper Retirement ID Number
DE	2016-03-A-DE
MA	2016-03-A-MA
MD	2016-03-A-MD
NJ	2016-03-A-NJ
NY	2016-03-A-NY
PA	2016-03-A-PA
RI	2016-03-A-RI
VA	2016-03-A-VA

En nombre de:

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Comisiones de servicios públicos estatales

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New Jersey Board of Public Utilities 44 S. Clinton Avenue Trenton, NJ 08625 (800) 624-0241	Virginia State Corporation Commission Public Utilities P.O. Box 1197 Richmond, Virginia 23218 (804) 371-9420

Si tiene alguna pregunta acerca de este aviso, haga referencia al número(s) de ID de retirada del cobre para su(s) estado(s) cuando haga su consulta:

Service Address State	Copper Retirement ID Number
DE	2016-03-A-DE
MA	2016-03-A-MA
MD	2016-03-A-MD
NJ	2016-03-A-NJ
NY	2016-03-A-NY
PA	2016-03-A-PA
RI	2016-03-A-RI
VA	2016-03-A-VA

Frequently Asked Questions

1. **Why fiber optics?** Fiber-optic facilities provide bandwidth to meet today's digital demands and the possibilities of tomorrow. And the quality, performance, and reliability that fiber-optics delivers for voice and other services are far superior to copper.
2. **I don't want fiber optics. What are my alternatives?** After we retire copper facilities in your area, we will only provide service over fiber-optics. So in order to continue receiving Verizon services, you will have to migrate to our fiber facilities.
3. **How can I schedule an appointment?** Over the next couple of months, Verizon will contact you to schedule an appointment that is convenient for you. You may also call us at 1.877.439.7442 to schedule an appointment.
4. **Is the installation process complicated? What equipment is needed in order for me to upgrade to the fiber-optic facilities?** Our goal is to make this as easy as possible. We will provide and install all the required equipment, and use the existing wiring at your home to connect to your phones. We will also provide a backup battery for voice service (see Question #6). Our technician will answer any questions you have and ensure everything is working properly before he or she leaves.
5. **Will my service or rates change as a result of the fiber upgrade?** Your existing voice service will not change, aside from the added benefit of being delivered over our better quality fiber-optic facilities. High Speed Internet is not available on fiber, but you may choose to have Fios Internet instead. If you choose to purchase Fios Internet, you will be billed accordingly for the service you select.
6. **What is the backup battery?** We will provide you with a backup battery device at no charge that will power your voice service in the event of a power outage, allowing you to make and receive calls, including to 911, on your corded telephones. For almost all residential customers, we can provide a battery backup device that can provide standby service for up to 20 hours using standard D-cell batteries. In the event of a prolonged power outage, you can simply replace the D-cell batteries for additional backup power. (Cordless phones, alarm equipment, or other devices that require electricity to operate will not be powered by the backup battery device.)
7. **What if I change providers?** Providers using Verizon's copper facilities have been notified regarding the copper-to-fiber transition and will also be required to migrate to Verizon's fiber-optic facilities. You may transfer (or "port") your number to a new provider.

Preguntas más frecuentes

1. **¿Por qué la fibra óptica?** Las instalaciones de fibra óptica ofrecen el ancho de banda necesario para responder a las exigencias digitales de hoy y a las posibilidades de mañana. Además, la calidad, rendimiento y confiabilidad que la fibra óptica ofrece para servicios de voz y de otro tipo son muy superiores al cobre.
2. **No quiero fibra óptica. ¿Qué otras alternativas hay?** Una vez retiremos las instalaciones de cobre de su área, solo prestaremos servicio a través de fibra óptica. Por este motivo, si desea seguir recibiendo los servicios de Verizon, deberá migrar a nuestras instalaciones de fibra.
3. **¿Cómo hago la cita?** Durante los dos próximos meses, Verizon se comunicará con usted para hacer una cita en la fecha que le resulte más conveniente. Si lo prefiere, puede llamarnos al teléfono 1.877.439.7442 para hacer la cita.
4. **¿Es complicado el proceso de instalación? ¿Qué equipo necesito para usar las instalaciones de fibra óptica?** Nuestra intención es que este proceso sea lo más sencillo posible. Nosotros le facilitaremos e instalaremos todo el equipo necesario y utilizaremos los cables que ya tiene instalados en su hogar para conectar los teléfonos. También le entregaremos una batería de reserva para el servicio de voz (ver la pregunta 6). Nuestro técnico contestará a sus preguntas y se asegurará de que todo funcione debidamente antes de irse.
5. **¿Cambiará el servicio o los precios debido a la actualización con fibra?** El servicio de voz que tiene ahora no cambiará, excepto que le llegará a través de las instalaciones de fibra óptica que son de calidad superior. El servicio de Internet de Alta Velocidad no se ofrece en las instalaciones de fibra, pero en su lugar puede suscribirse a Internet de Fios. Si decide hacerlo, se le facturará el servicio que elija.
6. **¿Qué es la batería de reserva?** Le facilitaremos de forma gratuita una batería de reserva que suministrará energía a su servicio de voz en caso de que haya un corte de electricidad, para que pueda hacer y recibir llamadas, incluido al 911, desde teléfonos fijos con cable. Para la mayoría de los clientes residenciales, estos dispositivos emplean pilas D-cell, capaces de proporcionar 20 horas de energía al servicio de voz en espera. Si el corte dura más de ese tiempo, solo tiene que cambiar las pilas para prolongar el suministro de reserva. Los teléfonos inalámbricos, los equipos de alarma y cualquier otro dispositivo que necesite electricidad para funcionar no recibirán la alimentación de la batería de reserva.
7. **¿Qué ocurre si cambio de proveedor?** Ya hemos notificado a los proveedores que utilizan las instalaciones de cobre de Verizon sobre la transición de cobre a fibra y también ellos tendrán que migrar a las instalaciones de fibra óptica de Verizon. Si lo desea puede transferir ("port") su número a otro proveedor.



NOTICE OF COPPER RETIREMENT

September 15, 2016

LTR0_RES*****AUTO**MIXED AADC 07099 T4 P1 PAL 100000839

M Plevin

1095 Copperstone Ct

Rockville, MD 20852-1141



Dear M Plevin:

Telephone Number: 301-251-1090

Currently, Verizon brings voice and/or data services to your home over copper cables. However, the company is upgrading to fiber-optic technology in your area, and will be retiring its copper facilities that currently serve you and your neighbors.

Our plan is to retire copper facilities in your area on or after September 15, 2017. To continue to provide you service, Verizon will have to move your service to these fiber-optic facilities.

Over the next few months, Verizon will be contacting you to schedule an appointment to have a Verizon technician come to your home and set up your services on fiber. You may also call us at 1.877.439.7442 to schedule an appointment.

We will transfer your voice services from copper to fiber at no cost to you. This transfer will not result in any change to the voice service that you currently receive from Verizon. You may continue to subscribe to the same voice service at the same price, terms, and conditions. In addition, any devices that rely on your voice service, such as fax machines, medical devices, or security alarms connected to a central station, will continue to work in the same way as they currently do over copper. We will also provide you with a battery backup device at no charge. For almost all residential customers, that device uses standard D-cell batteries that can support up to 20 hours of standby voice service during a commercial power outage. In case of a prolonged power outage, you can simply replace the batteries and extend the backup power.

If you subscribe to our High Speed Internet service, the migration to fiber will require a change since that service is not available on our fiber facilities. The Internet access service that we offer on fiber is Fios Internet. Fios Internet is available at significantly faster speeds than High Speed Internet. We will offer the service at a special rate for customers who migrate from copper to fiber facilities as a result of the retirement of our copper facilities. In some cases, this price may be lower or higher than what you currently pay for Internet access.

Please review the Frequently Asked Questions for additional information about the fiber upgrade or visit us at verizon.com/fiberupgrade. If you still have questions, please call us Monday through Friday, 8 a.m. - 8 p.m., or Saturday 9 a.m. - 5 p.m. at 1.877.439.7442.

You may also contact the Federal Communications Commission or your State Commission if you have any questions.

Thank you for continuing to be a loyal customer. We greatly appreciate your business.

Sincerely,

Janet Gazlay Martin
Director-Network Transformation
Verizon
230 W 36th St. Rm 802
NY, NY 10018

LTR0_RES



NOTICE OF COPPER RETIREMENT

September 15, 2016

LTRO_RES*****AUTO**5-DIGIT 21060 T265 P1 PAL 7 00053832

Louise Hoffman
7707 Overhill Rd
Glen Burnie, MD 21060-8193



Dear Louise Hoffman:

Telephone Number: 410-760-8545

Currently, Verizon brings voice and/or data services to your home over copper cables. However, the company is upgrading to fiber-optic technology in your area, and will be retiring its copper facilities that currently serve you and your neighbors.

Our plan is to retire copper facilities in your area on or after September 15, 2017. To continue to provide you service, Verizon will have to move your service to these fiber-optic facilities.

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Sincerely,

Janet Gazlay Martin
Director-Network Transformation
Verizon
230 W 36th St. Rm 802
NY, NY 10018

LTRO_RES

On behalf of:

Verizon Delaware LLC 901 Tatnall Street Wilmington, DE 19801	Verizon New Jersey Inc. 540 Broad Street Newark, NJ 07102	Verizon Virginia LLC 22001 Loudoun County Parkway Ashburn, VA 20147
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If you have questions about this notice, please reference the applicable Copper Retirement ID Number(s) for your state(s) in your inquiry:

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NJ	2016-03-A-NJ
NY	2016-03-A-NY
PA	2016-03-A-PA
RI	2016-03-A-RI
VA	2016-03-A-VA

Frequently Asked Questions

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3. **How can I schedule an appointment?** Over the next couple of months, Verizon will contact you to schedule an appointment that is convenient for you. You may also call us at 1.877.439.7442 to schedule an appointment.
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NOTICE OF COPPER RETIREMENT

September 15, 2016

LTR0_RES*****AUTO**5-DIGIT 20825 T259 P1 PAL 7 00052461

Joyce Rechtschaffen
4627 Hunt Ave
Chevy Chase, MD 20815-5424



Dear Joyce Rechtschaffen:

Telephone Number: 301-657-1752

Currently, Verizon brings voice and/or data services to your home over copper cables. However, the company is upgrading to fiber-optic technology in your area, and will be retiring its copper facilities that currently serve you and your neighbors.

Our plan is to retire copper facilities in your area on or after September 15, 2017. To continue to provide you service, Verizon will have to move your service to these fiber-optic facilities.

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You may also contact the Federal Communications Commission or your State Commission if you have any questions.

Thank you for continuing to be a loyal customer. We greatly appreciate your business.

Sincerely,

Janet Gazlay Martin
Director-Network Transformation
Verizon
230 W 36th St. Rm 802
NY, NY 10018

LTR0_RES

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Frederick E. Moacdieh
Executive Director
Federal Regulatory and Legal Affairs
1300 I Street, NW, Suite 400 West
Washington, DC 20005
Phone 202.515.2590
Fax 202.336.7922
frederick.moacdieh@verizon.com

September 15, 2016

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Verizon Public Notice of Network Change(s), CFR 47 Sections 51.325 – 51.335
Copper Retirement ID No. 2016-03-A-MD

Dear Ms. Dortch:

Pursuant to Sections 51.325 – 51.335 of the Commission's rules, Verizon hereby submits the attached Public Notice of Copper Retirement under rule 51.332. Specifically, Verizon is providing notification of the replacement of copper distribution and loop facilities with fiber-to-the-home facilities at some locations in the Bethesda, Columbia, Glen Burnie, Rockville, and Towson, MD wire centers. Upon completion, Verizon will provide services available over its fiber optic network.

The majority of customers served by copper at these locations purchase "plain old telephone service." Following the transition to fiber, Verizon will continue to offer these customers the same POTS service over fiber at the same or better price as they received on copper facilities. There will be no change in the underlying features and functionalities in their service: this is not a transition to IP-based service and Verizon will offer these customers the same regulated service they have today.

There may be one or more obsolete, narrowband services (such as certain DS0 level services) that are incompatible with or unavailable over fiber. If so, we will work closely with those customers to address their particular needs.

A copy of the attached notice was mailed to the Maryland Public Service Commission, Governor Larry Hogan, and the Department of Defense Chief Information Officer. Verizon has not provided notification to tribal entities as no tribal entity will be impacted by this copper retirement.

Please contact me should you need any further information.

Sincerely,



cc: Maryland Public Service Commission
Governor Larry Hogan
Department of Defense Chief Information Officer

On September 15, 2016 Verizon provided notice of copper retirement to the following:

W. Kevin Hughes
Chairman
Maryland Public Service Commission
6 St. Paul Street
16th Floor
Baltimore, MD 21202-6806

The Honorable Larry Hogan
Office of the Governor
State House
100 State Circle
Annapolis, MD 21401-1925

Department of Defense Chief Information Officer
Attn: Military Asst./Mobility Team
The Pentagon
Washington, DC 20301



6929 N. Lakewood Avenue
Tulsa, OK 74117

PUBLIC NOTICE OF COPPER RETIREMENT UNDER RULE 51.332
Copper Retirement ID No. 2016-03-A-MD

September 15, 2016

Carrier: Verizon Maryland LLC, 1 East Pratt Street, Baltimore, MD 21202

Contact: For additional information on these planned network changes, please contact:

Janet Gazlay Martin
Director – Network Transformation
Verizon Communications
230 W. 36th Street, Room 802
New York, NY 10018
1-844-881-4693

Implementation Date: On or after September 15, 2017

Planned Network Change(s) will occur at the following wire center areas in Maryland:

Wire Center	Address	CLLI
BETHESDA, MD	4533 Stanford St, Bethesda, MD 20815	CHCHMDBE
COLUMBIA, MD	5231 W Running Brook Rd, Columbia, MD 21044	CLMAMDCB
GLEN BURNIE, MD	215 Ritchie Lane, Glen Burnie, MD 21061	GLBRMDGL
ROCKVILLE, MD	490 Fleet St, Rockville, MD 20850	RKVLMDRV
TOWSON, MD	100 York Rd, Towson, MD 21204	TWSNMDTW

Attached Exhibit A lists the specific areas in which the copper network facilities will be retired. Exhibit A may also be viewed at <http://www.verizon.com/about/terms-conditions/network-disclosures>

Description of the planned network change(s):

Verizon intends to retire a number of copper facilities in the Bethesda, Columbia, Glen Burnie, Rockville, and Towson, MD wire center serving locations listed in the attached Exhibit A and to provide services over a fiber network infrastructure. Verizon has deployed its fiber-to-the-home network in the areas identified in Exhibit A.

Description of reasonably foreseeable impact(s) of the planned change(s):

After the retirement of the copper facilities, Verizon will: (1) no longer offer services over copper facilities; and (2) cease maintaining the copper facilities.

Description of any changes in prices, terms or conditions that will accompany the planned change(s):

As a general matter, the retirement of copper facilities will not result in changes to rates, terms and conditions in cases where the affected service is converted to a like-for-like service that is available on fiber facilities. Interconnecting entities, however, should review the applicable tariff or agreement for certain terms that may apply specifically in cases where the service is provisioned on fiber. In cases where interconnecting entities elect to replace the affected service with an alternative service that Verizon offers on fiber facilities, the rates, terms and conditions will be as set forth in the tariff or agreement under which Verizon offers the replacement service that the interconnecting entity selects. Verizon, separately from this notice, will provide interconnecting entities with further information regarding service migration options that Verizon offers.